

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA  
ERIE DIVISION

RANDY J. SPENCER,  
Plaintiff

v.

MATT MCSPARREN, BOB BETZOLD,  
FRED BUCKHOLTZ, and REGINA  
DELOE, ERIC HEIL, and TOWNSHIP  
OF CRANBERRY  
Defendants

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: Docket No. 1:23-cv-00036-SPB  
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: *Electronically Filed*  
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: **JURY TRIAL DEMANDED**

**CERTIFICATE PURSUANT TO F.R.CIV.P.37(A)(1)**

Counsel for the Movant, Timothy D. McNair, hereby certifies that, in accordance with F.R.Civ.P 37(a)(1), he conferred with counsel for Defendants, Justin A. Zimmerman, Esquire, in an effort to obtain the requested discovery without court action. Specifically, Counsel for Plaintiff spoke with Mr., Zimmerman on August 7, 2024 requesting responses to the discovery. Mr. Zimmerman, Counsel for Defendants, indicated that he was declining to do so.

On August 9, counsel for Plaintiff provided Mr. Zimmerman with the motion being filed herewith, but has received no response and accordingly is filing the motion.

Respectfully submitted,

MCNAIR LAW OFFICES, PLLC

By: /s/Timothy D. McNair

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